

JENNY L. FOLEY, Ph.D., ESQ.
Nevada Bar No. 9017
HKM EMPLOYMENT ATTORNEYS LLP
1785 E. Sahara Ave, Suite 325
Las Vegas, NV 89104
Tel: (702) 625-3893
Fax: (702) 625-3893
E-mail: jfoley@hkm.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

8 LEE KIRK, An Individual) CASE NO. 2:18-cv-00043
9)
10 Plaintiff,)
11 vs.)
12 TRULITE GLASS AND ALUMINUM)
13 SOLUTIONS, LLC, a Foreign Limited)
Liability Company, HERBERT CORTEZ,)
14 an Individual, STEVE WILLIAMS,)
an Individual, SHAUN HANNA, an)
15 Individual, DOES I -X;)
ROE CORPORATIONS I -X.)
16)
17 Defendants.)

**STIPULATION AND ORDER TO EXTEND THE TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS' MOTION TO DISMISS AND FOR DEFENDANTS
TO FILE THEIR REPLY IN SUPPORT OF THAT MOTION TO DISMISS
(FIRST REQUEST)**

21 COMES NOW, the Plaintiff, LEE KIRK (“Kirk”), by and through his attorney, JENNY
22 L. FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT ATTORNEYS LLP, and
23 Defendants, TRULITE GLASS AND ALUMINUM SOLUTIONS, LLC, HERBERT
24 CORTEZ, STEVE WILLIAMS, and SHAUN HANNA, (“DEFENDANTS”), by and through
25 their attorney, TIMOTHY ROEHRIS, ESQ., of LITTLER MENDELSON, P.C. and hereby
26 stipulate and agree as follows:
27

1 1. That the Opposition to the Defendants' Motion to Dismiss that was due on
2 March 20th, 2018, will now be due on March 28th, 2018.

3 2. That the Reply to the Opposition to the Defendants' Motion to Dismiss will then
4 be due on April 11, 2018.

5 3. This request for an extension of time is made in good faith and not for purpose
6 of delay and is based on Plaintiff's council experiencing the death of two immediate family
7 members and Defendants requiring additional time to file their Reply brief in light of Plaintiff's
8 Opposition being filed at a later date.

9 4. This is the first request for an extension of time with respect to the Opposition
10 and Reply briefs associated with Defendants' Motion to Dismiss.
11

12 Dated this 21st day of March, 2018.

13 **HKM Employment Attorneys LLP**

14 _____
15 */s/ Jenny L. Foley*
16 Jenny L. Foley, Ph.D., Esq.
17 Nevada Bar No. 9017
18 1785 East Sahara Ave., Suite 325
19 Las Vegas, Nevada 89104

20 Dated this 21st day of March, 2018.

21 **Littler Mendelson P.C.**

22 _____
23 */s/ Timothy Roehrs*
24 Timothy Roehrs, Esq.
25 Nevada Bar No. 9668
26 3960 Howard Hughes Parkway,
27 Suite 300
28 Las Vegas, Nevada 89169

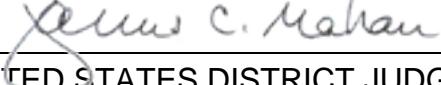
27 **ORDER**

1 The Court having reviewed the foregoing STIPULATION TO EXTEND THE TIME
2 FOR PLAINTIFF TO RESPOND TO DEFENDANTS' MOTION TO DISMISS AND FOR
3 DEFENDANTS TO FILE THEIR REPLY IN SUPPORT OF THAT MOTION TO DISMISS
4 in the above-entitled matter and for good cause appearing therefor,
5

6 **IT IS SO ORDERED** that the Opposition to the Defendants' Motion to Dismiss shall
7 be due on March 28th, 2018;

8 **IT IS SO ORDERED** that the Reply to the Opposition to the Defendants' Motion to
9 Dismiss shall be due on April 11, 2018.

10
11
12
13 March 23, 2018
14 Dated: _____

15
16 
17 _____
18 UNITED STATES DISTRICT JUDGE

19 Respectfully submitted by:
20 **HKM Employment Attorneys LLP**

21 _____
22 Jenny L. Foley, Ph.D., Esq.
23 Nevada Bar No. 9017
24 1785 East Sahara Ave, Suite 325
25 Las Vegas, Nevada 89104
26 Attorney for Plaintiff